Supreme Court, U. S.
FILED
OCT 11 1974

IN THE

Supreme Court of the United States

OCTOBER TERM, 1974

No. 74-165
No. 74-167
No. 74-168

UNITED STATES RAILWAY ASSOCIATION,

Appellant,

v.

CONNECTICUT GENERAL INSURANCE CORPORATION,

Appellee.

ON APPEAL FROM THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

MOTION FOR SPECIAL LEAVE OF COURT TO ARGUE ORALLY AS AMICUS CURIAE ON BEHALF OF 104 MEMBERS OF THE UNITED STATES CONGRESS

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October, 1974

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MOTION FOR SPECIAL LEAVE OF COURT TO ARGUE ORALLY AS AMICUS CURIAE ON BEHALF OF 104 MEMBERS OF THE UNITED STATES CONGRESS

1. The Attorney for *amicus curiae*, United States Representative Brock Adams, hereby respectfully moves, pursuant to Rule 44(7), for special leave of court to participate in the oral argument scheduled for October 23, 1974, as attorney for himself and certain other United States Representatives who have filed a brief *amicus curiae* in the above entitled cause. Counsel respectfully requests that the court grant ten minutes of time for this purpose.

2. Motion for leave of court to file a brief *amicus curiae* was filed by counsel in August 1974 pursuant to Rule 42. The brief *amicus curiae* filed with that motion has been circulated to all members of the House of Representatives prior to the filing of this motion for leave to argue orally. Counsel has been joined by 103 United States Representatives, the names of whom are listed hereinafter, in the submission of this motion.

3. Counsel for one of the parties offered to relinquish a proportionate amount of time if all the other parties agreed to do the same. The Solicitor General, however, refused to grant any time, even on this basis.

4. The *amici curiae* participated as members of the national legislature in the legislative process which led to the enactment of the Regional Rail Reorganization Act, and have a direct and immediate interest that the intent of the Congress in passing this law be accurately and properly presented to this Court.

Oral argument by counsel for the *amici curiae* would on some crucial points differ from the arguments of both the Government parties and the creditor interests already represented before the Court in this litigation, and would thereby afford this Court assistance not available from any other party.

Wherefore, counsel for *amici curiae* respectfully requests special leave of the Court to participate for ten minutes in the oral argument of the above entitled cause.

Respectfully submitted,

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